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Enterprises, Inc., Lucasfilm Ltd. LLC,
Lucasfilm Entertainment Company Ltd. LLC,
The Muppets Studio, LLC and Sanrio, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Disney Enterprises, Inc., Lucasfilm Ltd. }
LLC, Lucasfilm Entertainment Company }
Ltd. LLC, The Muppets Studio, LLC, and }
Sanrio, Inc., }
Plaintiffs, }
v. }
Sunny Welker a/k/a Sunny Leigh Welker, }
an individual and d/b/a Vinylies, and }
Does 1 through 10, inclusive, }
Defendants. }

Plaintiffs Disney Enterprises, Inc. (“DEI”), Lucasfilm Ltd. LLC (“LFL”), Lucasfilm Entertainment Company Ltd. LLC (“LECL”) (LFL and LECL are collectively referred to as the “Lucasfilm Plaintiffs”), The Muppets Studio, LLC (“Muppets”) and Sanrio, Inc. (“Sanrio”) (DEI, LFL, LECL, Muppets and Sanrio are collectively referred to as “Plaintiffs”) for their Complaint allege as follows:

1 **A. Jurisdiction and Venue**

2 1. The claim for copyright infringement under the Copyright Act, as
3 amended, 17 U.S.C. §§ 101, *et seq.*, alleges the unauthorized use in interstate
4 commerce of copyrights owned by Plaintiffs. The Court has jurisdiction over the
5 subject matter of the claim for copyright infringement pursuant to 28 U.S.C. § 1331
6 and § 1338(a). The Court has jurisdiction over the subject matter of the claim for
7 Trademark Infringement pursuant to the Lanham Trademark Act, as amended, 15
8 U.S.C., § 1051 *et seq.* and 28 U.S.C. § 1331 and § 1338.

9 2. Venue is proper within the Central District of California pursuant to 28
10 U.S.C. §§ 1391(b) and 1400(a).

11 **ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

12 **B. Introduction**

13 3. This case concerns the concerted, systematic and wholesale theft of
14 various world-famous intellectual properties owned by Plaintiffs. Defendants, despite
15 prior written notice, are engaged in the manufacture, importation, distribution,
16 promotion, sale and offer for sale of infringing vinyl charms, and related products,
17 which incorporate unauthorized likenesses of the animated or live action characters or
18 other logos owned by Plaintiffs (“Infringing Product”). Plaintiffs filed this action to
19 combat the willful sale of unlicensed and counterfeit products bearing Plaintiffs’
20 exclusive copyrights and trademarks. Despite previous service of a cease and desist
21 letter and the acknowledged receipt of same, Defendants’ ongoing and unauthorized
22 activity continues.

23 **C. Plaintiff DEI**

24 4. DEI is a corporation duly organized and existing under the laws of
25 the State of Delaware, having its principal place of business in Burbank, California.

26 5. DEI is a subsidiary of The Walt Disney Company (“Disney”).

1 Disney, together with its subsidiaries, is a diversified worldwide entertainment
2 company with operations in five business segments: Media Networks, Parks and
3 Resorts, Studio Entertainment, Consumer Products and Interactive Media. Media
4 Networks comprises international and domestic cable networks and its broadcasting
5 business; Parks and Resorts comprises resorts and theme parks around the world,
6 Disney Cruise Line and also licensed theme parks such as Tokyo Disney Resort in
7 Japan; Studio Entertainment comprises live-action and animated theatrical and video
8 motion pictures, musical recordings and live stage plays; Consumer Products
9 comprises relationships with licensees, manufacturers, publishers and retailers
10 throughout the world to design, develop, publish, promote and sell a wide variety of
11 products based on DEI's intellectual property as well as its own Publishing and
12 Retail; Interactive Media Group creates and delivers branded entertainment games
13 and lifestyle content across interactive media platforms.

14 6. A significant aspect of DEI's business is the merchandising and
15 licensing of distinctive elements associated with its motion picture and television
16 programs. The distinctive elements licensed and/or merchandised by DEI include,
17 but are not limited to, the world-famous characters featured in numerous animated
18 short films, feature length motion pictures and television programs produced over a
19 period of more than seventy years, including, but not limited to, Mickey Mouse,
20 Minnie Mouse, Goofy, Donald Duck, Chip, Dale and various characters from the
21 motion pictures *Aladdin*, *Alice in Wonderland*, *Beauty and the Beast*, *Cars*,
22 *Cinderella*, *Frozen*, *Lilo and Stitch*, *The Lion King*, *The Little Mermaid*, *Monsters,*
23 *Inc.*, *Monsters University*, *Mulan*, *The Nightmare Before Christmas*, *Pocahontas*, *The*
24 *Princess and the Frog*, *Sofia the First*, *Snow White and the Seven Dwarfs*, *Tangled*,
25 *Tinker Bell and the Great Fairy Rescue*, *Toy Story 3*, *Wall – E*, *Winnie the Pooh and*
26 *the Blustery Day*, and television show *Phineas and Ferb* (hereinafter collectively
27 referred to as the "DEI Characters").

1 7. The revenue from products which use the DEI Characters is
2 substantial. The appearance and other features of the DEI Characters are inherently
3 distinctive and serve to identify DEI and its licensees as the source of products
4 bearing the DEI Characters. The design, configuration and distinctive features of the
5 DEI Characters and other DEI copyrighted works, and of works related thereto
6 (hereinafter individually and collectively referred to as “DEI’s Copyrighted
7 Designs”), are wholly original with DEI and, as fixed in various tangible media,
8 including merchandise, are copyrightable subject matter under the United States
9 Copyright Act, 17 U.S.C., Sections 101, *et seq.* DEI is the owner of DEI’s
10 Copyrighted Designs and, as featured on in connection with various merchandise,
11 constitute copyrightable subject matter under the Copyright Act of 1976, 17 U.S.C. §
12 101, *et seq.*

13 8. DEI, and its predecessors in interest have complied in all respects with
14 the laws governing copyright and have secured the exclusive rights and privileges in
15 and to the copyrights to DEI’s Copyrighted Designs, and DEI owns one or more
16 certificates of registration for works in which each of DEI’s Copyrighted Designs
17 appear. A representative list of copyright registrations for DEI’s Copyrighted
18 Designs is attached hereto as Exhibit A.

19 9. Products featuring DEI’s Copyrighted Designs which are
20 manufactured, sold and distributed by DEI or under its authority have been
21 manufactured, sold and distributed in conformity with the provisions of the copyright
22 laws. DEI and those acting under its authority have complied with their obligations
23 under the copyright laws, and DEI, in its own right or as successor-in-interest, has at
24 all times been and still is the sole proprietor or otherwise authorized to enforce all
25 right, title and interest in and to the copyrights in each of DEI’s Copyrighted Designs.

26 10. DEI is the owner of world famous registered marks which serve to
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1 distinguish DEI products ("DEI's Trademarks"). Some of those trademarks have
2 been used continuously for over seventy years. Each year DEI spends a significant
3 amount to develop and maintain the considerable goodwill it enjoys in its trademarks
4 and in its reputation for high quality. A representative list of trademark registrations
5 for DEI's Trademarks is attached hereto as Exhibit B.

6 11. DEI's Trademarks are all valid, extant and in full force and effect.
7 DEI's Trademarks are all exclusively owned by DEI. DEI has continuously used
8 each of DEI's Trademarks from the registration date, or earlier, until the present and
9 at all times relevant to the claims alleged in this Complaint.

10 12. As a result of advertising and sales, together with longstanding
11 consumer acceptance, DEI's Trademarks identify DEI's products and authorized sales
12 of these products. DEI's Trademarks have each acquired secondary meaning in the
13 minds of consumers throughout the United States and the world. DEI's Characters,
14 Copyrighted Designs and Trademarks are collectively referred to herein as DEI's
15 Properties.

16 **D. Lucasfilm Plaintiffs**

17 13. The Lucasfilm Plaintiffs are affiliates of DEI and are corporations duly
18 organized and existing under the laws of the State of California, having their principal
19 place of business in Marin County, California.

20 14. The Lucasfilm Plaintiffs are some of the most celebrated film and
21 entertainment companies in the world, producing some of the most famous motion
22 pictures ever created.

23 15. The Lucasfilm Plaintiffs are the producers of the epic Star Wars film
24 series, the creation of writer-producer-director George Lucas. Ever since the first Star
25 Wars film premiered in 1977, the Star Wars saga has been a world-wide cultural
26 phenomenon. The original Star Wars film broke all box office records and generated
27 a series of six feature films (collectively, the "Star Wars Motion Pictures"), each of
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1 which is among the highest grossing motion pictures in United States box office
2 history.

3 16. The immense popularity of the Star Wars Motion Pictures created a
4 world-wide market for Star Wars licensed products including vinyl charms, and
5 numerous other products. The Lucasfilm Plaintiffs and their affiliated companies
6 oversee the manufacture, licensing, promotion, and sales of the consumer products
7 business for Star Wars. Licensing of products related to the Star Wars Motion
8 Pictures generates substantial revenue for the Lucasfilm Plaintiffs.

9 17. A significant source of revenue for the Lucasfilm Plaintiffs is the
10 merchandising and licensing of distinctive elements bearing character and
11 technological artwork, including, but not limited to, Luke Skywalker, Han Solo,
12 Princess Leia, Wookiee, Anakin Skywalker, R2-D2, C-3PO, Darth Vader, Boba Fett,
13 Yoda, Storm Trooper, Darth Maul, the X-Wing Fighter, Tie Fighter, Millennium
14 Falcon, AT-AT Walker, Jedi Star Fighter, A-Wing Fighter and B-Wing Fighter
15 (hereinafter individually and collectively referred to as the “Lucasfilm Characters”).

16 18. The revenue from products using the Lucasfilm Characters is substantial.
17 The appearance and other features of the Lucasfilm Characters are inherently
18 distinctive and serve to identify the Lucasfilm as the source of products bearing the
19 Lucasfilm Characters. The design, configuration and distinctive features of the
20 Lucasfilm Characters and other Lucasfilm copyrighted works, and of works related
21 thereto (hereinafter individually and collectively referred to as the “Lucasfilm
22 Copyrighted Designs”) are wholly original with LFL and, as fixed in various tangible
23 media including, without limitation, merchandise, are copyrightable subject matter
24 under the United States Copyright Act, 17 U.S.C., § 101, *et seq.* LFL LLC is the
25 owner of the Lucasfilm Copyrighted Designs and, as featured on and in connection
26 with various merchandise, these designs constitute copyrightable subject matter under
27 the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*
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1 19. LFL has complied in all respects with the laws governing copyright and
2 has secured the exclusive rights and privileges in and to the copyrights to the
3 Lucasfilm Copyrighted Designs, and LFL owns one or more certificates of
4 registration for works in which each of Lucasfilm's Copyrighted Designs appear. A
5 representative list of copyright registrations for LFL Copyrighted Designs is attached
6 hereto as Exhibit C. The Lucasfilm Copyrighted Designs manufactured, sold, and
7 distributed by LFL or under its authority have been manufactured, sold, and
8 distributed in conformity with the provisions of the copyright laws. LFL and those
9 acting under its authority have complied with their obligations under the copyright
10 laws. LFL is authorized to enforce all right, title, and interest in and to the copyrights
11 in each of the Lucasfilm Copyrighted Designs.

12 20. LFL and LECL also own all right, title, and interest in and to and hold
13 exclusive rights to develop, manufacture, market, and sell products bearing the
14 trademarks, trade names, service marks, artwork, characters, and other distinctive
15 elements for and incorporating the Lucasfilm Characters.

16 21. LFL owns numerous U.S. trademark registrations, including, but not
17 limited to, STAR WARS (Reg. No. 2485494) (collectively the "LFL Trademarks").

18 22. LECL owns numerous U.S. trademark registrations, including, but not
19 limited to, STAR WARS (Reg. No. 1126381) (collectively the "LECL Trademarks")
20 (hereinafter, the LFL Trademarks and the LECL Trademarks are collectively referred
21 to as the "Lucasfilm Trademarks").

22 23. The Lucasfilm Plaintiffs are the owners of world famous registered
23 marks, which serve to distinguish Lucasfilm products.

24 24. The Lucasfilm Trademarks have been in continuous use in interstate and
25 international commerce by the Lucasfilm Plaintiffs and their licensees in connection
26 with the sale of products related to the Star Wars Motion Pictures since at least as
27 early as the premiere of the first Star Wars film in 1977. Each year the Lucasfilm

1 Plaintiffs spend substantial amounts to develop and maintain the considerable good
2 will they enjoy in their trademarks and in their reputation for high quality.

3 25. As a result of the phenomenal success of the Star Wars Motion Pictures
4 and three decades of extensive marketing and promotion in and on Star Wars related
5 advertising, packaging and products, the Lucasfilm Trademarks are famous, have
6 acquired secondary meaning in connection with the sale of Star Wars related
7 products, and are strongly associated with Lucasfilm and the Star Wars Motion
8 Pictures in the minds of the general public.

9 The Lucasfilm Trademarks are all valid, extant, and in full force and effect. The
10 Lucasfilm's Trademarks are exclusively owned by the Lucasfilm Plaintiffs. The
11 Lucasfilm Plaintiffs have continuously used each of the Lucasfilm Trademarks from
12 the registration date, or earlier, until the present and at all times relevant to the claims
13 alleged in this Complaint. The Lucasfilm Characters, Copyrighted Designs and
14 Trademarks are collectively referred to herein as the "Lucasfilm Properties."

15 **E. Plaintiff Muppets**

16 26. Muppets is a limited liability company duly organized and existing
17 under the laws of the State of Delaware, having its principal place of business in
18 Burbank, California.

19 27. Muppets and certain of its affiliated companies is engaged in a variety
20 of businesses, including, without limitation, the producing and distributing of motion
21 pictures, television programs, publishing and selling books, games, toys and
22 providing entertainment services.

23 28. A significant aspect of Muppets business is the merchandising and
24 licensing of distinctive elements associated with its motion picture and television
25 programs. The distinctive elements licensed and/or merchandised by Muppets
26 include the world-famous fanciful characters featured in numerous animated
27 television shows and feature length motion pictures, including, but not limited to

1 Kermit the Frog and Miss Piggy, and various characters from the motion pictures *The*
2 *Muppets' Wizard of Oz* (hereinafter individually and collectively referred to as the
3 "Muppets Characters").

4 29. The revenue from products sold in the United States which use the
5 Muppets Characters is substantial. The appearance and other features of the Muppets
6 Characters are inherently distinctive and serve to identify Muppets and its licensees as
7 the source of products bearing the Muppets Characters. The design, configuration
8 and distinctive features of the Muppets Characters and other Muppets copyrighted
9 works, and of works related thereto (hereinafter individually and collectively referred
10 to as "Muppets' Copyrighted Designs"), are wholly original with Muppets and, as
11 fixed in various tangible media, including merchandise, are copyrightable subject
12 matter under the United States Copyright Act, 17 U.S.C., Sections 101 *et seq.*
13 Muppets is the owner of the Muppets' Copyrighted Designs and, as featured on in
14 connection with various merchandise, constitute copyrightable subject matter under
15 the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*

16 30. Muppets, and its predecessors in interest, have complied in all respects
17 with the laws governing copyright and have secured the exclusive rights and
18 privileges in and to the copyrights to the Muppets' Copyrighted Designs, and
19 Muppets owns one or more certificates of registration for works in which each of the
20 Muppets' Copyrighted Designs appear. A representative list of copyright
21 registrations for Muppets' Copyrighted Designs is attached hereto as Exhibit D.

22 31. Products featuring the Muppets Copyrighted Designs which are
23 manufactured, sold and distributed by Muppets or under its authority have been
24 manufactured, sold and distributed in conformity with the provisions of the copyright
25 laws. Muppets and those acting under its authority have complied with their
26 obligations under the copyright laws and Muppets, in its own right or as successor-in-
27 interest, has at all times been and still is the sole proprietor or otherwise authorized to
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1 enforce all right, title and interest in and to the copyrights in each of Muppets'
2 Copyrighted Designs.

3 32. Muppets is the owner of world famous registered marks which serve to
4 distinguish Muppets products, including, but not limited to, MUPPETS (Reg. No.
5 3185469) (collectively "Muppets Trademarks"). Each year Muppets spends a
6 significant amount of money to develop and maintain the considerable goodwill it
7 enjoys in its trademarks and in its reputation for high quality.

8 33. The Muppets Trademarks are all valid, extant and in full force and
9 effect. The Muppets Trademarks are all exclusively owned by Muppets. Muppets
10 has continuously used each of the Muppets Trademarks from the registration date, or
11 earlier, until the present and at all times relevant to the claims alleged in this
12 Complaint.

13 34. As a result of advertising and sales, together with longstanding
14 consumer acceptance, the Muppets Trademarks identify Muppets' products and
15 authorized sales of these products. The Muppets Trademarks have each acquired
16 secondary meaning in the minds of consumers throughout the United States and the
17 world. The Muppets Characters, Copyrighted Designs and Trademarks are
18 collectively referred to herein as "Muppets' Properties."

19 **F. Plaintiff Sanrio**

20 35. Sanrio is a corporation, duly organized and existing under the laws of
21 California, having its principal place of business in South San Francisco. Plaintiff
22 Sanrio is and, at all relevant times, has been, the exclusive U.S. licensee of Sanrio
23 Company, Ltd., a Japan corporation ("Sanrio Co."). Plaintiff Sanrio is a wholly-
24 owned subsidiary of Sanrio Co.

25 36. For more than forty years, Sanrio Co. has been engaged in the business
26 of manufacturing, distributing and selling a wide range of products including, without
27 limitation, character artwork created, developed and designed by Sanrio Co. for use
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1 by children and young adults. Certain of the characters and designs have achieved
2 such global fame and popularity that Sanrio Co. has produced and distributed
3 television programming for children based on the character artwork. One such
4 television program is the animated television series entitled *Hello Kitty*.

5 37. A significant source of revenue for Sanrio Co. is the merchandising and
6 licensing of distinctive elements bearing character artwork, including Hello Kitty,
7 Bad Badtz Maru, Chococat, KeroKeroKeroppi, Landy, Little Twin Stars, Monkichi,
8 My Melody, Patty and Jimmy, Pekkle, Picke Bicke, Pochacco, Tuxedo Sam,
9 Winkipinki and Zashikbuta (hereinafter individually and collectively referred to as
10 the “Sanrio Co. Characters”).

11 38. The revenue from products using the Sanrio Co. Characters sold in the
12 United States is substantial. The appearance and other features of the Sanrio Co.
13 Characters are inherently distinctive and serve to identify Sanrio as the source of
14 products bearing the Sanrio Co. Characters. The design, configuration and distinctive
15 features of the Sanrio Co. Characters and other Sanrio Co. copyrighted works, and of
16 works related thereto (hereinafter individually and collectively referred to as “Sanrio
17 Co.’s Copyrighted Designs”) are wholly original with Sanrio Co. and, as fixed in
18 various tangible media, including, without limitation, fabric and related merchandise,
19 are copyrightable subject matter under the United States Copyright Act, 17 U.S.C., §§
20 101 *et seq.* Sanrio Co. is the owner of Sanrio Co.’s Copyrighted Designs and, as
21 featured on and in connection with various merchandise, these designs constitute
22 copyrightable subject matter under the Copyright Act of 1976, 17 U.S.C. §§ 101, *et
seq.*

23 39. Sanrio Co. has complied in all respects with the laws governing
24 copyright and has secured the exclusive rights and privileges in and to the copyrights
25 to Sanrio Co.’s Copyrighted Designs, and Sanrio Co. owns one or more certificates of
26 registration for works in which each of Sanrio Co.’s Copyrighted Designs appear. A
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1 representative list of copyright registrations for Sanrio Co.'s Copyrighted Designs is
2 attached hereto as Exhibit E.

3 40. Products featuring Sanrio Co.'s Copyrighted Designs manufactured, sold
4 and distributed by Sanrio Co. or under its authority have been manufactured, sold and
5 distributed in conformity with the provisions of the copyright laws. Sanrio Co. and
6 those acting under its authority have complied with their obligations under the
7 copyright laws and Sanrio Co. has at all times been and still is the sole proprietor or
8 otherwise authorized to enforce all right, title and interest in and to the copyrights in
9 each of Sanrio Co.'s Copyrighted Designs.

10 41. Sanrio Co. owns all right, title and interest in and to and holds exclusive
11 right to develop, manufacture, market and sell products bearing the trademarks, trade
12 names, service marks, artwork, characters and other distinctive elements for and
13 incorporating the Sanrio Co. Characters in the United States.

14 42. Sanrio Co. is the owner of world famous registered marks which serve to
15 distinguish Sanrio Co. products. Some of those trademarks have been used
16 continuously for over twenty-five years. Each year, Sanrio Co. spends millions of
17 dollars to develop and maintain the considerable good will it enjoys in its trademarks
18 and in its reputation for high quality. A representative list of trademark registrations
19 for the Sanrio Co. Characters is attached hereto as Exhibit F (collectively "Sanrio
20 Co.'s Trademarks").

21 43. Sanrio Co.'s Trademarks are all valid, extant and in full force and effect.
22 Sanrio Co.'s Trademarks are all exclusively owned by Sanrio Co. Sanrio Co. has
23 continuously used each of Sanrio Co.'s Trademarks from the registration date, or
24 earlier, until the present and at all times relevant to the claims alleged in this
25 Complaint.

26 44. As a result of advertising and sales, together with longstanding consumer
27 acceptance, Sanrio Co.'s Trademarks identify Sanrio Co.'s products and authorized
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1 sales of these products. Sanrio Co.'s Trademarks have each acquired secondary
2 meaning in the minds of consumers throughout the United States and the world. The
3 Sanrio Co. Characters, Sanrio Co.'s Copyrighted Designs and Sanrio Co.'s
4 Trademarks are collectively referred to herein as "Sanrio Co.'s Properties."

5 45. The DEI Characters, Lucasfilm Characters, Muppets Characters and the
6 Sanrio Co. Characters are collectively referred to herein as "Plaintiffs' Characters."
7 DEI's Copyrighted Designs, Lucasfilm Copyrighted Designs, Muppets' Copyrighted
8 Designs and the Sanrio Co.'s Copyrighted Designs are collectively referred to herein
9 as "Plaintiffs' Copyrighted Designs." The DEI Trademarks, Lucasfilm Trademarks,
10 Muppets Trademarks and the Sanrio Co.'s Trademarks are collectively referred to
11 herein as "Plaintiffs' Trademarks." Plaintiffs' Copyrighted Designs and Plaintiffs'
12 Trademarks are collectively referred to herein as "Plaintiffs' Properties."

13 **G. Defendants**

14 46. Plaintiffs are informed and believe that Defendant Sunny Welker also
15 known as Sunny Leigh Welker ("Welker") is an individual and doing business as
16 "Vinylies." Plaintiffs are informed and believe that Welker is a resident of the city of
17 Homestead, in the State of Florida. Plaintiffs are further informed and believe, and
18 based thereon allege, that Welker had the right and ability to supervise or control the
19 infringing activity alleged herein and that Welker had a direct financial interest in
20 such activity. In addition or alternatively, Defendant Welker had knowledge or
21 reason to know of the infringing activity and took actions which contributed to such
22 activity.

23 47. Upon information and belief, Does 1 – 10 are either entities or
24 individuals who are residents of or present in this judicial district, and are subject to
25 the jurisdiction of this Court. Upon information and belief, Does 1 – 10 are principals
26 or supervisory employees of the named defendants, suppliers of the named defendants
27 or other entities or individuals who are manufacturing, distributing, selling and/or
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1 offering for sale merchandise in this judicial district which infringes some or all of
2 Plaintiffs' Properties. The identities of the various Does are unknown to Plaintiffs at
3 this time. The Complaint will be amended to include the names of such individuals
4 when identified. The named defendants and Does 1 – 10 are collectively referred to
5 herein as "Defendants."

6 **COUNT I - COPYRIGHT INFRINGEMENT**

7 48. Plaintiffs bring the following claim of copyright infringement against
8 Defendants and incorporate by reference the allegations contained in paragraphs 1
9 through 47 above.

10 49. Defendants have manufactured, distributed, sold, or offered for sale,
11 unauthorized or counterfeit vinyl charms, and other products bearing Plaintiffs'
12 Copyrighted Designs. Lists of some, but not all, of said copyrighted properties
13 owned by Plaintiffs appear in Exhibits A, C, D and E.

14 50. Defendants have never been authorized by Plaintiffs to distribute
15 Plaintiffs' Copyrighted Designs, nor have Plaintiffs ever authorized, licensed, or in
16 any manner allowed Defendants the right to manufacture, distribute, sell, or offer for
17 sale, any merchandise including, but not limited to vinyl charms, or related
18 merchandise which bear any of Plaintiffs' Copyrighted Designs.

19 51. Defendants have manufactured, distributed, sold, or offered for sale,
20 unauthorized or counterfeit vinyl charms, and other products which incorporate
21 Plaintiffs' Copyrighted Designs, in direct violation of Plaintiffs' copyrights.

22 52. Defendants committed their acts with actual as well as constructive
23 knowledge of Plaintiffs' exclusive rights, and their actions have contributed to the
24 infringing, copying, duplication, sale, or offer for sale, counterfeit copies of Plaintiffs'
25 Copyrighted Designs. Each act by Defendants that infringes one of Plaintiffs'
26 Copyrighted Designs is the basis for a separate claim against Defendants under the
27 Copyright Act.
28

53. Upon information and belief, Defendants' acts as alleged are willful infringements of and have irreparably harmed Plaintiffs' copyrights and exclusive rights and threaten further infringements and further irreparable harm to Plaintiffs' copyrights and exclusive rights. Further harm and injury to Plaintiffs is imminent, and Plaintiffs are without an adequate remedy at law with respect to such harm and injury. Unless Defendants' acts are enjoined and the illicit counterfeiters of Plaintiffs' Copyrighted Designs are stopped, it is highly probable that Defendants, or others under Defendants' direction, will manufacture, distribute, sell, or offer for sale, additional counterfeit vinyl charms, and other products which bear Plaintiffs' Copyrighted Designs causing further irreparable injury to Plaintiffs.

54. Defendants have obtained gains, profit, and advantages as a result of their wrongful acts noted above.

55. Plaintiffs are entitled, at their option, to statutory damages as provided by 17.U.S.C. § 504 in lieu of actual damages and Defendants' profits.

**COUNT II - TRADEMARK INFRINGEMENT AND TRADEMARK
COUNTERFEITING**

56. Plaintiffs bring the following claims of trademark infringement and trademark counterfeiting against Defendants and incorporate by reference the allegations contained in paragraphs 1 through 55 above.

57. Plaintiffs own or are licensees of the exclusive rights to Plaintiffs' Trademarks. All of the trademark registrations are in full force and effect and are owned by Plaintiffs or Plaintiffs' licensors. Many of the trademarks are incontestable pursuant to 15 U.S.C. § 1065.

58. Plaintiffs, or those under their authority, manufacture and distribute all of their advertising and products in conformity with the provisions of the United States trademark law.

1 59. Notwithstanding Plaintiffs' or their licensors' well-known and prior
2 common law and statutory rights in Plaintiffs' Trademarks, Defendants have, with
3 actual and constructive notice of Plaintiffs' federal registration rights and long after
4 Plaintiffs' established their rights, adopted and used the trademarks in conjunction
5 with the sale of vinyl charms, and other products in the State of California and
6 interstate commerce.

7 60. Defendants have distributed, sold, or offered for sale, vinyl charms, and
8 other products bearing Plaintiffs' Trademarks without Plaintiffs' authorization.
9 Defendants' distribution, sale, or offer for sale of unauthorized or counterfeit vinyl
10 charms, and other products bearing Plaintiffs' Trademarks in California and interstate
11 commerce has and will cause the likelihood of confusion, deception, and mistake in
12 that the buying public will conclude that the products sold by Defendants are
13 authorized, sponsored, approved, or associated with Plaintiffs.

14 61. Said acts of infringement will cause irreparable injury to Plaintiffs if
15 Defendants are not restrained by the Court from further violation of Plaintiffs' rights
16 as Plaintiffs have no adequate remedy at law.

17 62. Plaintiffs have suffered damages as a result of Defendants' acts.

18 63. Defendants' use in commerce of Plaintiffs' Trademarks in conjunction
19 with the sale of unauthorized vinyl charms, and other products is an infringement of
20 Plaintiffs' registered trademarks in violation of 15 U.S.C. § 1114(1).

21 64. Defendants committed the acts alleged herein intentionally, fraudulently,
22 maliciously, willfully, wantonly, and oppressively with the intent to injure Plaintiffs
23 and their businesses.

24 65. The unlicensed vinyl charms, and other products bearing Plaintiffs'
25 trademarks that Defendants sold, distributed, or offered for sale, constitutes a
26 counterfeit product pursuant to 15 U.S.C. § 1116(d).

1 **COUNT III - UNFAIR COMPETITION UNDER THE LANHAM ACT**

2 66. Plaintiffs bring the following claim of unfair competition under the
3 Lanham Act against Defendants and incorporate by reference the allegations
4 contained in paragraphs 1 through 65 above.

5 67. As a direct result of Plaintiffs' longstanding use, sales, advertising, and
6 marketing, Plaintiffs' Trademarks have acquired a secondary and distinctive meaning
7 among the public who have come to identify Plaintiffs' Trademarks listed on Exhibits
8 B and F, and in paragraphs 21 and 32, with Plaintiffs and their respective products.

9 68. The unauthorized and counterfeit vinyl charms, and other products that
10 Defendants have sold and distributed duplicate, use and take Plaintiffs' Trademarks
11 and delude and confuse the public into believing that Plaintiffs approved, authorized,
12 or sponsored the vinyl charms, and other products sold, offered for sale, or distributed
13 by Defendants.

14 69. Defendants, by misappropriating and using the likenesses of Plaintiffs'
15 trademarks in connection with the sale of vinyl charms, and other products, are
16 misrepresenting and will continue to misrepresent and falsely describe to the general
17 public the origin and sponsorship of their products. Defendants have caused such
18 products to enter into interstate commerce willfully with full knowledge of the falsity
19 of the designation of their origin and description and representation in an effort to
20 mislead the purchasing public into believing that their products are authorized or
21 emanate from Plaintiffs.

22 70. These acts constitute a violation of Section 43 of the Lanham Act, 15
23 U.S.C. § 1125.

24 71. Defendants have obtained gains, profits, and advantages as a result of
25 their unlawful acts.

26 72. Plaintiffs have suffered monetary damages as a result of Defendants'
27 acts.
28

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand entry of a judgment against the Defendants as follows:

1. Permanent injunctive relief restraining Defendants, their officers, agents, servants, employees, representatives, successors and assigns, attorneys, and all those in active concert or participation with them from:

a. Further infringing Plaintiffs' copyrighted properties, trademarks, and licensed trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, displaying, or otherwise disposing of any products not authorized by Plaintiffs including, but not limited to, vinyl charms, and other products bearing any simulation, reproduction, counterfeit, copy, or colorable imitation of any of Plaintiffs' Properties;

b. Using any simulation, reproduction, counterfeit, copy, or colorable imitation of any of Plaintiffs' copyrighted properties, trademarks, and licensed trademarks in the promotion, advertisement, display, sale, offer for sale, manufacture, production, circulation, or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Plaintiffs or to any goods sold, manufactured, sponsored, or approved by or connected with Plaintiffs;

c. Making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act that can or is likely to lead the trade or public, or individual members thereof, to believe that any products manufactured, distributed, or sold by Defendants is in any manner associated or connected with Plaintiffs, or are sold, manufactured, licensed, sponsored, approved, or authorized by Plaintiffs;

d. Engaging in any other activity constituting unfair competition with any of Plaintiffs, or constituting an infringement of any of Plaintiffs' trademarks or of

1 Plaintiffs' rights in, or to use or to exploit said trademarks, or constituting any
2 dilution of any of Plaintiffs' names, reputations, or goodwill;

3 e. Effecting assignments or transfers, forming new entities or
4 associations or using any other device for the purpose of circumventing or otherwise
5 avoiding the prohibitions set forth in Subparagraphs a. through d.;

6 f. Secreting, destroying, altering, removing, or otherwise dealing
7 with the Unauthorized Products or any books or records that may contain any
8 information relating to the importing, manufacturing, producing, distributing,
9 circulating, selling, marketing, offering for sale, advertising, promoting, or displaying
10 of all unauthorized products that infringe any of Plaintiffs' trademarks or copyrights;
11 and

12 g. From aiding, abetting, contributing to, or otherwise assisting
13 anyone from infringing upon any of Plaintiffs' trademarks or copyrights.

14 2. Temporary restraining order and seizure order authorizing Plaintiffs to
15 seize the following items which are in Defendants' possession, custody or control:

16 a. All unauthorized products bearing Plaintiffs' Properties or
17 likenesses thereof;

18 b. Any other unauthorized products which reproduce, copy,
19 counterfeit, imitate or bear any of Plaintiffs' Properties or which picture, reproduce,
20 copy or use the likeness of or bear a substantial similarity to Plaintiffs' Properties;

21 c. Any labels, packages, wrappers, containers, and any other
22 unauthorized promotional or advertising material which reproduce, copy, counterfeit,
23 imitate or bear any of Plaintiffs' Properties or which picture, reproduce, copy or use
24 the likeness of or bear a substantial similarity to Plaintiffs' Properties;

25 d. Any molds, screens, patterns, plates, negatives, machinery or other
26 equipment used for making or manufacturing any unauthorized products or
27
28

1 unauthorized items which bear Plaintiffs' Properties or which bear a substantial
2 similarity to any of Plaintiffs' Properties; and

3 e. Any sales and supply of customer journals, ledgers, invoices,
4 purchase orders, sales records, inventory control documents, bank records, catalogs,
5 website development materials, and all other business records, including any written
6 or computer communication in printed or stored media such as online sales or
7 advertisement as well as email and chat logs, believed to concern the manufacture,
8 importation, purchase, advertising, sale or offering for sale of any unauthorized
9 products, including computers, hard drives, servers or other digital storage on which
10 such documents or data is stored.

11 3. Directing that Defendants report to this Court within thirty (30) days
12 after a Permanent Injunction is entered to show their compliance with paragraphs 1
13 and 2 above.

14 4. Directing such other relief as the Court may deem appropriate to prevent
15 the trade and public from gaining the erroneous impression that Plaintiffs authorized
16 or are related in any way to any products manufactured, sold, or otherwise circulated
17 or promoted by Defendants.

18 5. Awarding to Plaintiffs from Defendants, as a result of Defendants' sale
19 of any unauthorized products bearing Plaintiffs' trademarks, three times Plaintiffs'
20 damages and three times Defendants' profits, after an accounting, or statutory
21 damages, should Plaintiffs opt for such relief, consisting of \$200,000.00 for each of
22 Plaintiffs' trademarks infringed upon by Defendants, and to the extent this Court
23 concludes such infringement was willful, \$2,000,000.00 for Plaintiffs' trademarks
24 infringed upon by Defendants pursuant to 15 U.S.C. § 1114 and § 1117.

25 6. Awarding to each Plaintiff from Defendants selling any unauthorized
26 products three times its damages therefrom and three times Defendants' profits
27 therefrom, after an accounting, pursuant to 15 U.S.C. § 1125(a) and § 1117.
28

1 7. That Plaintiffs be awarded from each Defendant found to be in violation
2 of their copyrighted properties, Defendants' profits, or at Plaintiffs' election, an
3 award of statutory damages pursuant to 15 U.S.C. § 504, of no less than Seven
4 Hundred and Fifty Dollars (\$750) nor more than Thirty Thousand Dollars (\$30,000)
5 per copyrighted property infringed upon by each Defendant, at the Court's discretion,
6 or should this Court find that such infringement was willful, that this Court, pursuant
7 to its discretion, award statutory damages of up to One Hundred and Fifty Thousand
8 Dollars (\$150,000) for each copyrighted property infringed upon by each such
9 Defendant.

10 8. Awarding to Plaintiffs their reasonable attorneys' fees and investigative
11 fees pursuant to 15 U.S.C. § 1117.

12 9. Awarding to Plaintiffs their costs in bringing this action.

13 10. Awarding punitive damages to Plaintiffs for Defendants' willful acts of
14 unfair competition.

15 11. Awarding other such relief to Plaintiffs as this Court deems just.

16
17 Dated: April 2, 2015

J. Andrew Coombs, A Professional Corp.

18
19 By:


J. Andrew Coombs
Annie S. Wang

20
21 Attorneys for Plaintiffs Disney
22 Enterprises, Inc., Lucasfilm Ltd. LLC,
Lucasfilm Entertainment Company Ltd. LLC,
The Muppets Studio, LLC, and Sanrio, Inc.
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DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs Disney Enterprises, Inc., Lucasfilm, Ltd., LLC, Lucasfilm Entertainment Company Ltd. LLC, The Muppets Studio, LLC, and Sanrio, Inc. hereby demand a trial by jury of all issues so triable.

Dated: April 4, 2015

J. Andrew Coombs, A Professional Corp.

By:

~~J. Andrew Coombs
Annie S. Wang~~

Attorneys for Plaintiffs Disney
Enterprises, Inc., Lucasfilm Ltd. LLC,
Lucasfilm Entertainment Company Ltd. LLC,
and The Muppets Studio, LLC, and Sanrio, Inc.

EXHIBIT A**DEI'S COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
VA 58 937	Mickey - 1 (Mickey Mouse)	Model Sheet
VA 58 938	Minnie - 1 (Minnie Mouse)	Model Sheet
Gp 80 184	Donald Duck	Publications Model Sheet
VA 58 933	Daisy - 1 (Daisy Duck)	Model Sheet
VA 58 936	Goofy - 1 (Goofy)	Model Sheet
Gp 80 192	Pluto	Publications Model Sheet
VAu 64 814	Baby Mickey	Model Sheet
VAu 64 814	Baby Minnie	Model Sheet
VAu 73 216	Baby Donald Duck	Model Sheet
VAu 73 217	Baby Daisy Duck	Model Sheet
VAu 83 225	Baby Goofy	Model Sheet
VAu 73 219	Baby Pluto	Model Sheet
R 48 971	Disney's Uncle Scrooge in Only a Poor Old Man	Comic Strip
RE 424 728	Walt Disney's Ludwig von Drake	Comic Strip
Gp 105 126	Horace Horsecollar	Model Sheet
R 567 615	Chip	Model Sheet
R 567 614	Dale	Model Sheet
VA 184 345	Huey, Dewey & Louie -1	Model Sheet
Gp 105 128	Clarabelle Cow	Model Sheet
RE 636 587	Winnie the Pooh and the Honey Tree	Motion Picture
RE 718 378	Winnie the Pooh and the Blustery Day	Motion Picture
VA 58 940	Pooh - 1 (Winnie the Pooh)	Model Sheet
Gp 81 528	Rabbit	Publications Model Sheet
Gp 81 528	Owl	Publications Model Sheet
Gp 85 651	Kanga and Roo	Publications Model Sheet
Gp 81 528	Eeyore	Publications Model Sheet
Gp 81 528	Piglet	Publications Model Sheet
Gp 81 528	Gopher	Publications Model Sheet
Gp 81 527	Tigger	Publications Model Sheet
R 354 235	Snow White and the Seven Dwarfs	Motion Picture
R 346 870	Bashful	Drawings
R 346 869	Doc	Drawings
R 346 875	Dopey	Drawings
R 346 876	Grumpy	Drawings

1	R 346 871	Happy	Drawings
2	R 346 874	Sleepy	Drawings
3	R 346 873	Sneezy	Drawings
4	R 346 872	Snow White	Drawings
5	R 346 868	Snow White "Witch"	Drawings
6	R 406 910	Pinocchio	Motion Picture
7	Gp 80 186	Pinocchio	Publications Model Sheet
8	Gp 80 188	Jiminy Cricket	Publications Model Sheet
9	R 427 860	Fantasia	Motion Picture
10	R 433 627	The Reluctant Dragon	Motion Picture
11	R 442 538	Dumbo	Motion Picture
12	R 428 428	Dumbo Suggestions for Dumbo	Drawing
13	R 428 420	Mother Elephant Suggestions for "Dumbo"	Drawing
14	R 428 430	Dumbo Ringmaster Suggestions 1348	Drawing
15	R 428 427	Dumbo - Stork Suggestions	Drawing
16	R 428 426	Timothy Mouse Suggestions	Drawing
17	R 428 432	Dumbo "Miscellaneous Crows" - 2006	Drawing
18	R 458 260	Bambi	Motion Picture
19	R 433 645	Bambi - Bambi	Drawing
20	R 433 630	Bambi - Final Thumper Model - 2002	Drawing
21	R 433 631	Bambi - Skunk Model - 2002	Drawing
22	R 433 636	Bambi - Owl and Stag Models	Drawing
23	R 433 632	Faline "Adolescent Age"	Drawing
24	R 433 633	Bambi's Mother	Drawing
25	R 467 541	Saludos Amigos	Motion Picture
26	R 464 785	Joe Carioca	Drawing
27	R 516 560	The Three Caballeros	Motion Picture
28	R 550 316	Make Mine Music	Motion Picture
29	R 557 922	Song of the South	Motion Picture
30	R 548 629	Brer Rabbit	Drawing
31	R 548 626	Brer Bear	Drawing
32	R 577 489	Fun and Fancy Free	Motion Picture
33	R 605 180	Melody Time	Motion Picture
34	R 636 303	The Adventures of Ichabod & Mr. Toad	Motion Picture
35	R 648 396	Cinderella	Motion Picture
36	R 632 319	Cinderella	Copyright Booklet
37	R 632 319	Drizella	Copyright Booklet
38	R 632 319	Anastasia	Copyright Booklet
39	R 632 319	Stepmother	Copyright Booklet
40	R 632 319	Fairy Godmother	Copyright Booklet
41	R 632 319	Prince	Copyright Booklet
42	R 632 319	Bruno, the Dog	Copyright Booklet
43	R 632 319	Lucifer, the Cat	Copyright Booklet
44	R 632 319	Jaq and Gus	Copyright Booklet
45	RE 27 746	Alice in Wonderland	Motion Picture
46	VA 58 920	Alice - 1 (Alice)	Model Sheet

1	VA 58 919	Alice - 2 (The White Rabbit)	Model Sheet
2	VA 58 921	Alice – 3 (Queen of Hearts)	Model Sheet
3	VA 58 922	Alice - 4 (Cheshire Cat)	Model Sheet
4	VA 58 923	Alice - 5 (Caterpillar)	Model Sheet
5	VA 58 924	Alice - 6 (Tweedledee and Tweedledum)	Model Sheet
6	VA 58 922	March Hare	Model Sheet
7	VA 58 922	Mad Hatter	Model Sheet
8	RE 64 027	Peter Pan	Motion Picture
9	RE 66 285	Peter Pan	Coloring Book
10	RE 66 285	Tinkerbell	Coloring Book
11	RE 66 285	Captain Hook	Coloring Book
12	RE 66 285	Mr. Smee	Coloring Book
13	RE 66 285	Nana	Coloring Book
14	RE 162 852	Lady and the Tramp	Motion Picture
15	RE 101 764	Lady	Previews of Pictures
16	RE 101 764	Tramp	Previews of Pictures
17	RE 296 296	Sleeping Beauty	Motion Picture
18	RE 246 671	Princess Aurora	Book
19	RE 246 671	Prince Phillip	Book
20	RE 246 671	Maleficent/Dragon	Book
21	RE 370 901	One Hundred and One Dalmatians	Motion Picture
22	RE 546 478	The Sword in the Stone	Motion Picture
23	RE 557 357	Archimedes	Copyright Booklet
24	RE 557 357	Merlin	Copyright Booklet
25	RE 557 357	Wart/Arthur	Copyright Booklet
26	RE 557 357	Madame Mim	Copyright Booklet
27	RE 571 201	Mary Poppins	Motion Picture
28	RE 705 510	The Jungle Book	Motion Picture
29	RE 679 798	Mowgli	Drawing
30	RE 679 799	Baloo	Drawing
31	RE 679 795	Bagheera	Drawing
32	RE 679 805	King Louie	Drawing
33	RE 679 797	Kaa	Drawing
34	RE 679 807	Shere Khan	Drawing
35	Lp 38 283	The Aristocats	Motion Picture
36	Gu 44 754	O'Malley	Drawing
37	Gu 44 750	Duchess	Drawing
38	Gu 44 748	Edgar	Drawing
39	Gu 44 745	Roquefort	Drawing
40	VA 1-099-033	Marie Valentine Spring 2002	Style Guide
41	Lp 39 817	Bedknobs and Broomsticks	Motion Picture
42	Gu 46 904	Crocky	Drawing
43	Gu 46 908	Sailor Bear	Drawing
44	Gu 46 906	Codfish	Drawing
45	Gu 46 917	Secretary Bird	Drawing
46	LP 42 905	Robin Hood	Motion Picture
47	Gu 46 582	Robin Hood	Drawing

1	Gu 46 583	Little John	Drawing
2	Gu 46 584	Sir Hiss	Drawing
3	Gu 47 230	Sheriff of Nottingham	Drawing
4	Gu 47 762	Friar Tuck	Drawing
5	Gu 46 585	Prince John	Drawing
6	Gu 50 764	Maid Marion	Drawing
7	Gu 50 763	Lady Cluck	Drawing
8	Lp 49 678	The Rescuers	Motion Picture
9	Gp 96 289	Miss Bianca	Drawing
10	Gp 96 286	Orville	Drawing
11	Gp 96 288	Madame Medusa	Drawing
12	Gp 96 287	Bernard	Drawing
13	Gp 103 814	Penny	Drawing
14	Gu 57 278	Rufus	Drawing
15	Gu 56 625	Evinrude	Drawing
16	PA 1 371	Pete's Dragon	Motion Picture
17	Gp 111 695	Elliott the Dragon	Drawing
18	PA 125 861	The Fox and the Hound	Motion Picture
19	VAu 10 933	Todd (Young)	Drawing
20	VAu 10 930	Copper (Pup)	Drawing
21	VAu 10 936	Vixey	Drawing
22	VAu 10 928	Big Mama	Drawing
23	VAu 12 417	Dinky	Drawing
24	VAu 12 418	Boomer	Drawing
25	VAu 12 415	Squeeks	Drawing
26	PA 252 525	The Black Cauldron	Motion Picture
27	VAu 24 517	Eilonwy	Drawing
28	VAu 29 561	Fflewddur	Drawing
29	VAu 24 518	Gurgi	Drawing
30	VAu 24 070	Hen Wen	Drawing
31	VAu 24 592	The Horned King	Drawing
32	VAu 24 519	Taran	Drawing
33	VAu 47 075	Orddu	Drawing
34	VAu 47 073	Orgoch	Drawing
35	VAu 47 074	Orwen	Drawing
36	PA 290 808	The Great Mouse Detective	Motion Picture
37	VAu 76 103	Basil 185-126	Model Sheet
38	VAu 76 102	Dr. Dawson 1284-80	Model Sheet
39	VAu 81 570	Olivia	Model Sheet
40	VAu 76 100	Ratigan 285-166	Model Sheet
41	VAu 81 572	Fidget	Model Sheet
42	VAu 81 571	Flaversham	Model Sheet
43	VAu 86 112	Felicia - Clean Up Model 0238	Model Sheet
44	VAu 76 104	Toby 285-170	Model Sheet
45	VAu 85 019	Mrs. Judson	Model Sheet
46	VAu 85 021	Queen Victoria	Model Sheet
47	VAu 85 022	Bartholomew	Model Sheet
48	PA 385 556	Oliver and Company	Motion Picture
49	VAu 104 921	Dodger Construction Sheets	Model Sheet

1	VAu 104 920	Einstein Construction Sheets	Model Sheet
2	VAu 104 919	Frances Construction Sheets	Model Sheet
3	VAu 104 916	Rita Construction Sheets	Model Sheet
4	VAu 109 377	Oliver Rough Model	Model Sheet
5	VAu 109 379	Tito - Ruff Model	Model Sheet
6	VAu 119 949	How to Draw Georgette	Model Sheet
7	PA 431 543	The Little Mermaid	Motion Picture
8	VAu 123 355	Ariel 9-9-87 Ruff (Ariel)	Drawings
9	VAu 123 351	Scuttle	Drawings
10	VAu 123 354	Ruff Sebastian 9-4-87 (Sebastian)	Drawings
11	VAu 123 348	Ruff Ursula 9-9-87 (Ursula)	Drawings
12	VAu 123 352	Prince Eric	Drawings
13	VAu 123 350	Triton	Drawings
14	VAu 123 353	FLOTSAM/JETSAM	Drawings
15	VAu 123 349	Flounder	Drawings
16	PAu 1 024 341	DuckTales	Motion Picture
17	VAu 101 067	Launchpad McQuack	Pamphlet of Drawings
18	VAu 101 067	Webby	Pamphlet of Drawings
19	VAu 101 067	Doofus	Pamphlet of Drawings
20	VAu 101 067	Mrs. Beakley	Pamphlet of Drawings
21	VAu 101 067	Duckworth	Pamphlet of Drawings
22	PA 486 535	The Rescuers Down Under	Motion Picture
23	VAu 161 749	Cody	Model Sheets
24	VAu 155 884	Jake (Rough Models)	Model Sheets
25	VAu 155 844	McLeach (Rough Model)	Model Sheets
26	VAu 170 264	Marahute (Rough Model)	Model Sheets
27	PA 542 647	Beauty and the Beast	Motion Picture
28	VAu 200 866	Belle (Beauty and the Beast)	Artwork
29	VAu 210 914	Beast	Licensing Kit
30	VAu 194 311	Maurice (Beauty and the Beast)	Artwork
31	VAu 199 855	Mrs. Potts (Beauty and the Beast)	Artwork
32	VAu 200 868	Cogsworth (Beauty and the Beast)	Artwork
33	VAu 194 310	Lumiere (Beauty and the Beast)	Artwork
34	VAu 201 337	Chip (Beauty and the Beast)	Artwork
35	VAu 194 307	Gaston (Beauty and the Beast)	Artwork
36	VAu 194 309	LeFou (Beauty and the Beast)	Artwork
37	VAu 199 856	Phillipe (Beauty and the Beast)	Artwork
38	VAu 200 869	Featherduster (Beauty and the Beast)	Artwork
39	PA 583 905	Aladdin	Motion Picture
40	VAu 215 432	Aladdin - Aladdin	Model Sheet
41	VAu 215 453	Aladdin - Genie	Model Sheet
42	VAu 215 793	Aladdin - Abu	Model Sheet
43	VAu 218 349	Aladdin - Iago	Model Sheet
44	VAu 230 534	Aladdin - Rasoul	Model Sheet
45	VAu 218 348	Aladdin - The Sultan	Model Sheet

1	VAu 230 533	Aladdin - Jafar	Model Sheet
2	VAu 221 841	Aladdin - Jasmine	Model Sheet
3	VAu 221 842	Aladdin - Jafar as Beggar	Model Sheet
4	VAu 232 164	Aladdin - Narrator	Model Sheet
5	PA 659 979	The Lion King	Motion Picture
6	VAu 246 448	The Lion King - Mufasa	Model Sheet
7	VAu 245 946	The Lion King - Sarabi	Model Sheet
8	VAu 246 447	The Lion King - Simba	Model Sheet
9	VAu 246 440	The Lion King - Young Simba	Model Sheet
10	VAu 246 438	The Lion King - Nala	Model Sheet
11	VAu 246 664	The Lion King - Young Nala	Model Sheet
12	VAu 245 947	The Lion King - Rafiki	Model Sheet
13	VAu 245 945	The Lion King - Shenzi, Banzai & Ed	Model Sheet
14	VAu 246 437	The Lion King - Pumbaa	Model Sheet
15	VAu 245 662	The Lion King - Timon	Model Sheet
16	VAu 246 446	The Lion King - Scar	Model Sheet
17	VA 611 201	Zazu	Licensing Kit
18	PA 720 179	Pocahontas	Motion Picture
19	VAu 262 859	Pocahontas - Pocahontas Standing	Artwork
20	VAu 261 970	Pocahontas - Powhatan	Artwork
21	VAu 261 967	Pocahontas - Percy	Artwork
22	VAu 302 884	Pocahontas - John Smith	Artwork
23	VAu 302 886	Pocahontas - Meeko the Raccoon	Artwork
24	VAu 302 883	Pocahontas - Flit the Hummingbird	Artwork
25	VAu 300 559	Pocahontas - Ratcliffe	Artwork
26	VAu 302 885	Pocahontas - Grandmother Willow	Artwork
27	PA 765 713	Toy Story	Motion Picture
28	VAu 337 565	Toy Story - Woody	Artwork
29	VAu 337 566	Toy Story - Buzz Lightyear	Artwork
30	VAu 337 567	Toy Story - Hamm	Artwork
31	VAu 337 568	Toy Story - Rex	Artwork
32	VAu 337 569	Toy Story - Bo Peep Lamp and Sheep	Artwork
33	VAu 337 186	Toy Story - Lenny	Artwork
34	VAu 273 627	Toy Story - Mom	Artwork
35	VAu 348 598	Toy Story - Andy	Artwork
36	VAu 348 599	Toy Story - Hannah	Artwork
37	PA 795 221	The Hunchback of Notre Dame	Motion Picture
38	VAu 336 992	The Hunchback of Notre Dame - Quasimodo	Model Sheet
39	VAu 332 434	The Hunchback of Notre Dame - Esmeralda	Model Sheet
40	VAu 336 056	The Hunchback of Notre Dame - Phoebus	Model Sheet
41	VAu 336 057	The Hunchback of Notre Dame - Djali	Model Sheet
42	VAu 343 663	The Hunchback of Notre Dame - Gargoyles	Model Sheets
43	VAu 336 058	The Hunchback of Notre Dame - Clopin	Model Sheet
44	VAu 336 059	The Hunchback of Notre Dame - Frollo	Model Sheet

1	VAu 336 878	The Hunchback of Notre Dame - Will Doll/Sam Doll	Model Sheet
2	PA 670 961	Hercules	Motion Picture
3	VAu 369 603	Hercules - Hercules	Model Sheets
4	VAu 369 600	Hercules - Baby Hercules	Model Sheets
5	VAu 367 973	Hercules - Meg	Model Sheets
6	VAu 369 605	Hercules - Pegasus	Model Sheets
7	VAu 369 598	Hercules - Baby Pegasus	Model Sheets
8	VAu 367 965	Hercules - Phil	Model Sheets
9	VAu 367 964	Hercules - Hades	Model Sheets
10	VAu 367 969	Hercules - Pain	Model Sheets
11	VAu 375 850	Hercules - Panic	Model Sheets
12	VAu 377 944	Hercules - Hydra Head	Model Sheet
13	PA 799 025	Mulan	Motion Picture
14	VA 849 510	Mulan	Style Guide
15	VAu 379 045	The Legend of Mulan - Mulan	Model Sheets
16	VAu 379 027	The Legend of Mulan - Mulan as Ping	Model Sheets
17	VAu 379 021	The Legend of Mulan - Mushu	Model Sheets
18	VAu 379 024	The Legend of Mulan - Shang	Model Sheets
19	VAu 378 480	The Legend of Mulan - Kahn	Model Sheets
20	VAu 381 069	The Legend of Mulan - Cricket	Model Sheets
21	PA 901 890	A Bug's Life*	Motion Picture
22	VA 875 986	A Bug's Life*	Style Guide
23	VAu 399 357	Flik*	Model Sheets
24	VAu 399 356	Hopper*	Model Sheets
25	VAu 399 351	Atta*	Model Sheets
26	VAu 399 349	Dot*	Model Sheets
27	VAu 399 343	Dim*	Model Sheets
28	VAu 399 352	Tuck & Roll*	Model Sheets
29	VAu 399 350	Francis*	Model Sheets
30	VAu 399 348	Heimlich*	Model Sheets
31	VAu 399 353	Slim*	Model Sheets
32	VAu 399 342	Rosie*	Model Sheets
33	VAu 399 346	P.T. Flea*	Model Sheets
34	VAu 399 345	Manny*	Model Sheets
35	VAu 399 344	Gypsy*	Model Sheets
36	VAu 399 347	Thumper*	Model Sheets
37	VAu 399 354	Molt*	Model Sheets
38	VAu 399 355	Queen*	Model Sheets
39	PA 959 870	Toy Story 2*	Motion Picture
40	VAu 414 563	Toy Story 2 - Al's Car*	Model Sheet
41	VAu 405 573	Toy Story 2 - Bullseye*	Model Sheet
42	VAu 406 700	Toy Story 2 - Coffee Table*	Model Sheet
43	VAu 407 195	Toy Story 2 - Cushy Chair*	Model Sheet
44	VAu 405 571	Toy Story 2 - Emporer Zurg*	Model Sheet
45	VAu 405 572	Toy Story 2 - Jessie*	Model Sheet
46	VAu 405 197	Toy Story 2 - L'il Yippie*	Model Sheet
47	VAu 405 574	Toy Story 2 - Prospector*	Model Sheet
48	VAu 407 196	Toy Story 2 - Wood Chair*	Model Sheet
49	VA960 902	Toy Story 2 - Style Guide*	Style Guide

1	PA 974 011	Dinosaur	Motion Picture
2	VAu 486 473	Aladar	Model Sheet
3	VAu 486 477	Baylene	Model Sheet
4	VAu 486 476	Bruton	Model Sheet
5	VAu 486 478	Eema	Model Sheet
6	VAu 486 475	Kron	Model Sheet
7	VAu 486 474	Neera	Model Sheet
8	VAu 486 472	Plio	Model Sheet
9	VAu 486 479	Suri	Model Sheet
10	VAu 486 471	Yar	Model Sheet
11	VA 996 530	Dinosaur - Phase I	Style Guide
12	VA 992 942	Dinosaur - Phase II	Style Guide
13	PA 940 885	The Emperor's New Groove	Motion Picture
14	VA 999 573	Emperor's New Groove	Style Guide
15	VAu 479 682	Kronk	Model Sheet
16	VAu 479 685	Kuzco	Model Sheet
17	VAu 479 683	Kuzco Llama	Model Sheet
18	VAu 479 684	Pacha	Model Sheet
19	VAu 479 681	Yzma	Model Sheet
20	PA 1-250-536	The Incredibles	Motion Picture
21	VA 1-242-351	The Incredibles	Style Guide
22	PA 1-322-908	Cars	Motion Picture
23	VA 1-326-323	Cars – Style Guide	Style Guide
24	VA 1-403-647	Hannah Montana – Branding Guide	Style Guide
25	PA 659-601	Tim Burton's The Nightmare Before Christmas	Motion Picture
26	PA 1-313-530	High School Musical	Motion Picture
27	VA 1-405-082	High School Musical – Branding Guide	Style Guide
28	PA 1-627-575	Hannah Montana the Movie	Motion Picture
29	PA 1-635-067	Up	Motion Picture
30	PA 1-641-991	G-Force	Motion Picture
31	PA 1-606-305	Wall-E	Motion Picture
32	VA 1-663-815	Wall-E – Branding and Supplement Style Guide RSM 2008	Style Guide
33	PA 1-598-561	High School Musical 2	Motion Picture
34	VA 1-651-813	High School Musical 2 – Summer 2008 Style Guide Supplement	Style Guide
35	PA 1-613-593	High School Musical 3: Senior Year	Motion Picture
36	VA 1-655-713	Beverly Hills Chihuahua	One Sheet
37	PA 1-611-956	Beverly Hills Chihuahua	Motion Picture
38	Pau 2-921-728	Little Mermaid III: Ariel's Beginning	Screenplay
39	VA 515-038	Little Mermaid III: Ariel's Beginning	Comic Book
40	PA 1-623-231	Bedtime Stories	Motion Picture
41	PA 1-588-972	Underdog	Motion Picture
42	PA 1-595-126	Enchanted	Motion Picture
43	PA 1-332-118	Meet the Robinsons	Motion Picture
44	VA 1-358-218	Meet the Robinsons—Style Guide	Style Guide
45	PA 1-122-518	Cinderella II : Dreams come true / produced by Walt Disney Television	Motion Picture

1		Animation ; directed by John Kafka	
2	PA 1-612-331	Cinderella III: A Twist in Time	Motion Picture
3	PA 1-611-943	Tinker Bell	Motion Picture
4	PA 1-617-950	Bolt	Motion Picture
5	VA 1-663-828	Bolt – Fall/Winter Style Guide 2008	Style Guide
6	PA 1-688-323	Toy Story 3	Motion Picture
7	VA 1-800-737	Toy Story 3: GC Product Dev – Style Guide – Spring/Summer 2010	Style Guide
8	PA 1-348-114	Handy Manny: no. 1-01	Motion Picture
9	VAu 959-473	Handy Manny Design Pack – Characters	Drawings
10	VA 1-650-599	Handy Manny Repair Shop – Spring/Summer 2008 Product Development Guide	Style Guide
11	PA 1-224-960	Pirates of the Caribbean: The Curse of the Black Pearl	Motion Picture
12	PA 1-322-906	Pirates of the Caribbean: Dead Man's Chest	Motion Picture
13	PA 1-334-112	Pirates of the Caribbean: At World's End	Motion Picture
14	PA 1-737-564	Pirates of the Caribbean: On Stranger Tides	Motion Picture
15	PA 1-742-101	Cars 2	Motion Picture
16	VAu 1-089-554	Cars 2: Professor Z	Visual Material
17	VA 1-781-144	Cars 2: Tokyo City - Mini	Visual Material
18	PA 1-814-870	Wreck-It Ralph	Motion Picture
19	VAu 1-116-667	Wreck-It Ralph: Adorabeezle Winterpop	Model Sheet
20	VAu 1-116-688	Wreck-It Ralph: Duncan	Model Sheet
21	VAu 1-116-686	Wreck-It Ralph: King Candy	Model Sheet
22	VAu 1-116-671	Wreck-It Ralph: Gloyd Orangboar	Model Sheet
23	PA 1-800-721	Brave	Motion Picture
24	VAu 1-093-274	Brave: Angus	Model Sheet
25	VAu 1-089-531	BRAVE: Family – King Fergus, Queen Elinor, Merida & Royal Triplets Harris, Hubert & Hamish	Visual Material
26	VA 1-814-373	Brave: General Art Guide	Visual Material
27	PA 1-713-579	Tron: Legacy	Motion Picture
28	VA 1-753-501	Tron Legacy: Vertical Banner: Olivia	Visual Material
29	VA 1-753-496	Tron Legacy: Vertical Banner: Jeff	Visual Material
30	VA 1-753-498	Tron Legacy: Vertical Banner: Garrett	Visual Material
31	PA 1-811-293	Frankenweenie	Motion Picture
32	VAu 1-082-013	Frankenweenie: Bob	Model Sheet
33	VAu 1-082-015	Frankenweenie: Edgar "E" Gore	Model Sheet
34	VAu 1-075-939	Frankenweenie: Mr. Frankenstein	Model Sheet
35	PA 1-856-767	Planes	Motion Picture
36	PA 1-656-826	Princess and the Frog, The	Motion Picture
37	PA 1-713-851	Tangled	Motion Picture
38	PA 1-871-077	Frozen	Motion Picture
39	PA 1-038-178	Monsters, Inc.	Motion Picture

1	PA 1-848-339	Disney Pixar Monsters University	Motion Picture
2	PA 1-146-502	Finding Nemo	Motion Picture
3	PA 1-354-935	Ratatouille	Motion Picture
4	PA 1-703-137	Tinker Bell and the Great Fairy Rescue	Motion Picture
5	VA 1-800-738	Tinker Bell and the Great Fairy Rescue-Global Creative P Fall 2010	Style Guide
6	VA 1-831-654	Doc McStuffins-Global Creative P-SS13	Style Guide
7	VA 1-770-111	Disney Handy Manny-Tool Team Product Design Portfolio-Preschool	Style Guide
8	VA 1-802-675	Jake and the Neverland Pirates-Global Creative B Preschool FA12 (Disney Jr)	Style Guide
9	VA 1-850-709	Disney Sofia the First-Global Creative P FH13	Style Guide
10	VA 1-766-270	Phineas and Ferb Branding Guide Global Creative Boys FA11	Style Guide
11	VA 1-864-307	Disney The Muppets Character Art & Photography Guide	Style Guide
12	PA 1-082-244	Lilo and Stitch	Motion Picture
13	VA 1-094-896	Lilo and Stitch	Style Guide
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EXHIBIT B**DEI'S TRADEMARKS**

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date	International Class(es) of Goods
	Design Plus Words, Letters, and/or Numbers	3358127	12/18/2007	14
Cinderella	Standard Character Mark	3,818,772	7/13/2010	14 and 25
Daisy Duck	Standard Character Mark	Serial No. 86491487	Filed 12/29/2014	14
Disney	Standard Character Mark	4,042,815	10/18/2011	3 and 14
Donald Duck	Standard Character Mark	3,730,003	12/22/2009	3, 14, 18, 20, 21, 24 and 30
	Design Only	4,222,295	10/9/2012	3, 9, 14, 16, 18, 20, 21, 24, 25, 28 and 30
Eeyore	Standard Character Mark	3,658,535	7/21/2009	14, 18, 20, 21 and 24
	Design Only	4,551,976	6/17/2014	14
Goofy	Standard Character Mark	4,324,736	4/23/2013	9, 14, 21, 25and 28
Grumpy	Standard Character Mark	3,850,362	9/21/2010	14, 18, 21 and 24

1	Mickey Mouse	Standard Character Mark	3,588,873	3/10/2009	9, 14, 16, 18 and 25
2		Design Only	3,580,906	2/24/2009	14
3		Design Only	1,857,626	10/11/1994	14
4	Minnie Mouse	Standard Character Mark	3,588,872	3/10/2009	14, 18, 20, 21 and 24
5		Design Only	3,656,661	7/21/2009	14
6		Design Plus Words, Letters, and/or Numbers	3,428,095	5/13/2008	14
7	Disney Princess	Standard Character Mark	3,379,422	2/5/2008	14
8	Peter Pan	Standard Character Mark	3,636,908	6/9/2009	14
9	Pooh	Standard Character Mark	Serial No. 77106448	Filed 2/13/2007	3, 14, 18, 20, 21, 24, 29, 30 and 32
10	Sofia the First	Standard Character Mark	4511096	4/8/2014	14
11	Snow White	Standard Character Mark	4,572,675	7/22/2014	9 and 14

1		Design Only	2,860,445	7/6/2004	14, 20, 21, 25 and 28
2		Design Only	4,400,332	9/10/2013	3, 9, 14, 16, 18, 20, 21, 24, 25 and 28
3	Tigger	Standard Character Mark	Serial No. 77106420	Filed 2/13/2007	9, 14, 16, 18, 20, 21, 24, 25 and 28
4	Tinker Bell	Standard Character Mark	3648928	6/30/2009	14
5	Tinkerbell	Standard Character Mark	1569589	12/5/1989	14
6	Toy Story	Typed Drawing	2,520,404	12/18/2001	14, 21, 24, 28 and 30
7		Design Plus Words, Letters, and/or Numbers	3,057,988	2/7/2006	9, 14, 16, 18, 21, 24, 25 and 28
8		Design Plus Words, Letters, and/or Numbers	2,895,969	10/19/2004	9, 14, 16, 18, 21, 24, 25 and 28
9		Design Plus Words, Letters, and/or Numbers	2,895,967	10/19/2004	9, 14, 16, 18, 21, 24, 25 and 28
10		Design Plus Words, Letters, and/or Numbers	2,891,463	10/5/2004	3, 9, 14, 16, 18, 21, 24, 25 and 28

1		Design Only	4,195,045	8/21/2012	3, 9, 14, 16, 18, 20, 21, 24, 25 and 28
2	Winnie the Pooh	Standard Character Mark	Serial No. 77106287	Filed 2/13/2007	14, 18, 20, 21, 24 and 30
3	Alice in Wonderland	Standard Character Mark	3,829,626	8/30/2010	14, 18, 20 and 30
4	Cheshire Cat	Standard Character Mark	3,794,964	5/25/2010	9, 14, 18, 20, 21, 24, 25, 28 and 30
5	Sleeping Beauty	Standard Character Mark	3,677,818	9/1/2009	14 and 16
6	Tangled	Standard Character Mark	4,109,374	3/6/2012	14
7	Rapunzel	Standard Character Mark	3,994,403	7/12/2011	14
8	Chip and Dale	Standard Character Mark	3,900,892	1/4/2011	9, 14, 16, 18, 20, 21, 24, 25, 28, and 30
9		Design Only	4,412,568	10/8/2013	3, 9, 14, 16, 18, 20, 21, 24, 25 and 28
10		Design Plus Words, Letters, and/or Numbers	2,895,966	10/19/2004	9, 14, 16, 18, 21 and 28
11		Design Plus Words, Letters, and/or Numbers	2,895,968	10/19/2004	9, 14, 16, 18, 21, 24, 25 and 28

EXHIBIT C**LFL'S COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
RE 925-302	Star Wars: Episode IV – A New Hope	Motion Picture
PA 072-282	Star Wars: Episode V – The Empire Strikes Back	Motion Picture
PA 172-810	Star Wars: Episode VI – Return of the Jedi	Motion Picture
PA 933-148	Star Wars: Episode I – Phantom Menace	Motion Picture
PA 1-072-564	Star Wars: Episode II – Attack of the Clones	Motion Picture
PA 1-271-265	Star Wars: Episode III – Revenge of the Sith	Motion Picture
RE 903-682	Tie Fighter Chasing X-Starfighter	Visual Material
VA 1-762-350	Yoda	Visual Material
VA 134-990	Luke Skywalker	Visual Material
RE 905-920	Luke Skywalker	Visual Material
VA 971-032	Anakin Skywalker	Visual Material
VA 135-000	Boba Fett	Visual Material
VA 134-993	R2-D2	Visual Material
VA 134-943	R2-D2 and C-3PO	Visual Material
VA 971-030	C-3PO	Visual Material
VA 134-994	C-3PO	Visual Material
VA 1-843-230	Darth Vader and Son	Visual Material
VA 134-991	Darth Vader	Visual Material
VA 074-472	Darth Vader	Visual Material
VA 971-037	Darth Maul	Visual Material
VA 134-992	Princess Leia	Visual Material
VA 134-999	Han Solo	Visual Material

EXHIBIT D**THE MUPPETS' COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
Gp 117351	Kermit The Frog	Visual Material
Gp 117363	Fozzie Bear	Visual Material
RE 192365	Kermit the Muppet	Visual Material
Gu 61163	Miss Piggy	Visual Material
PA 193-777	The Fantastic Miss Piggy Show	Motion Picture
PA 297-692	The Kermit and Piggy Story	Motion Picture
PA 373-596	A Muppet Family Christmas	Motion Picture
VA 537-325	Jim Henson's Muppet Babies	Visual Material

EXHIBIT E**SANRIO CO.'S COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
TX 3-769-888	SANRIO 1993 Product and Sales Promotion Catalog	Literary Work
VAu 684-322	Sanrio 2005 Character Guide	Graphic Artwork
VA 1-303-874	Character Merchandising	Collective work of artwork, text and photos
VA 1-296-115	2004 – 100 Characters	Graphic Artwork
VA 811-440	Bad Badtz Maru	Graphic Artwork
VAu 498-617	Chococat	Art original
VA 130-420	Hello Kitty	Graphic Artwork
VA 636-579	KeroKeroKeroppi	Sticker Book
VA 707-212	KeroKeroKeroppi	Pictorial Cartoon Drawing
VA 246-421	Little Twin Stars	Stickers
VA 840-495	Monkichi	Graphic Artwork
VA 130-419	My Melody	Graphic Artwork
VA 130-421	Patty & Jimmy	Graphic Artwork
VA 636-582	Pekkle	Graphic Artwork
VA 840-496	Picke Bicke	Graphic Artwork
VA 636-580	Pochaco	Sticker Book
VA 148-625	Tuxedo Sam	Stickers
VA 840-494	Winkipinki	Graphic Artwork
VA 636-581	Zashikibuta	Stickers
VA 1-352-721	Keroppi / Little Frog...Big Splash	Visual Material
Vau 1-078-385	Sanrio 2010 Character Guide	Visual Material
VA 1-342-775	SANRIO 2002 HELLO KITTY STYLE GUIDE	Visual Material
VA 657-748	KOBUTA NO PIPPO	Visual Material
VA 1-342-774	SANRIO 2005 KEROPPI STYLE GUIDE	Visual Material
Vau 655-028	THE RUNABOUTS - 2001	Visual Material
VA 1-416-374	TENORIKUMA(BLUE CAFE), MY MELODY(HEART), KUROMI(KUROMIS), CHARMMY KITTY(RABBIT), HELLO KITTY(LOGO) EVERYDAY CAT.JUNE 2006	Visual Material

1		MASYUMARU(INTRO); CINNAMOROLL(SPORT); SUGARBUNNIES(DOUGHNUTS); CHARMMYKITTY(RABBIT); LITTLE TWIN STARS(STARS); HELLO KITTY(BEAR); EVERYDAY CATALOG JULY 2006	
2	VA 1-416-375		Visual Material
3	VA 1-370-020	PANDAPPLE(INTRO), FROOLIEMEW(FANCY), CHOCOCAT(DOT)/SANRIO 2005 PRODUCT CATALOG AUG NEW	Visual Material
4	VA 1-303-873	DOKIDOKI HOTDOG / THE CHILI PEPPER TRIO / CATALOG EVERYDAY 5 MAY 2003	Visual Material

EXHIBIT F
SANRIO TRADEMARKS

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date	International Class(es) of Goods
Hello Kitty	Design Only	1,200,083	7/6/82	3; 8; 14; 16; 18; 21; 24; 25; 26 and 28
Hello Kitty	Design Only	1,277,721	5/15/84	3; 5; 9; 14-16; 18; 20-21; 24-26; 28 and 30
Hello Kitty	Typed Drawing	1,279,486	5/29/84	3; 5; 8; 9; 14-16; 18; 20-21; 24-26; 28 and 30
Keroppi	Standard Character Mark	3,181,349	12/5/06	14
Little Twin Stars	Standard Character Mark	3,245,992	5/29/07	14
Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,680	6/3/03	14
Bow	Design only	3,260,857	7/10/2007	14
Outline of Hello Kitty	Design only	3,751,315	2/23/2010	14